

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

United States Courts
Southern District of Texas
FILED

OCT 19 2023

Nathan Ochsner, Clerk
Laredo Division

LAWRENCE (LARRY) W. SINCLAIR)

c/o 1520 Sherman Street)

Laredo, Texas 78040)

Plaintiff, Pro Se)

Civil Action No. 5:23-CV-109

AMENDED COMPLAINT

VS)

AND JURY DEMAND

BRIAN MARK KRASSENSTEIN)

15128 Anchorage Way)

Fort Meyers, Florida 33908;)

EDWARD LAWRENCE KRASSENSTEIN)

15251 Intracoastal Ct)

Fort Meyers, Florida 33908;)

E&B ADVERTISING INC)

15128 Anchorage Way)

Fort Meyers, Florida 33908;)

FORUM ADVERTISING LLC)

15128 Anchorage Way)

Fort Meyers, Florida 33908,)

Defendants.)

1 Plaintiff Lawrence (Larry) W. Sinclair, Pro Se files this complaint against
2 defendants Brian Mark Krassenstein, Edward Lawrence Krassenstein, E&B Advertising
3 Inc., and Forum Advertising LLC (collectively referred to as "defendants"), and alleges
4 as follows:

5 **PARTIES**
6

- 7 1. Plaintiff, Lawrence (Larry) W. Sinclair, is a citizen of Texas.
8
9 2. Defendant, Brian Mark Krassenstein, is a citizen of Florida.
10
11 3. Defendant Edward Lawrence Krassenstein is a citizen of Florida.
12
13 4. Defendant E&B Advertising Inc. is a Florida Corporation with its principal
14 place of business in Fort Meyers, Florida.
15
16 5. Defendant Forum Advertising LLC is a Florida LLC with its principal place of
17 business in Fort Meyers Florida. Forum has Two members: Brian Mark
18 Krassenstein and Edward Lawrence Krassenstein establishing defendant
Forum Advertising LLC citizenship of Florida. **EXHIBIT A 3-pages**

19 **JURISDICTION AND VENUE**
20
21

- 22 6. Subject matter jurisdiction exists pursuant to 28 U.S.C. § 1332, 28 U.S.C. §
23 1337; 28 U.S.C. § 1332(a)(1), in that plaintiff and defendants are citizens of
24 different states and the matter in dispute exceeds to sum or value of \$75,000,
25 exclusive of interest or costs.
26
27 7. Personal jurisdiction over the defendants is proper in this District. Defendants
28 have continuous and systemic contacts with the Southern District of Texas
and have been and are conducting and doing business within the district.

29 **BACKGROUND**

- 30
- 31 8. Plaintiff is a private citizen who is a citizen of the state of Texas and is a
- 32 disabled 62-year-old.
- 33 9. Plaintiff did in 2008 make allegations in the US Presidential election regarding
- 34 then candidate Barack Obama which resulted in massive amount of false and
- 35 libelous claims and statements to be published online by individuals as well
- 36 as some media outlets directed toward discrediting plaintiffs' statements.
- 37 10. Plaintiff has over the past 15 plus years privately secured multiple FOIA
- 38 requests documents and investigations documenting the falsification of official
- 39 government records as well as continuous harassment.
- 40 11. Plaintiff was contacted in July 2023 by representatives for Journalists Tucker
- 41 Carlson asking if plaintiff would agree to an interview regarding the 2008
- 42 attacks and how plaintiff was affected by the attacks.
- 43 12. Plaintiff agreed to the interview request with full expectation that once the
- 44 interview aired, it would result in a flood of republication of a great amount of
- 45 the libelous false statements and claims previously published by others.
- 46 13. Plaintiff had already known that the false libelous claims and statements
- 47 previously published had been shown to be untrue since 2012 and had
- 48 prepared to address any renewed publication of libel by simply contacting
- 49 those publishing it asking them to retract, admit they published information
- 50 they took from google search without verifying its truthfulness and apologize
- 51 for doing so.

52 14. Plaintiff additionally provided documentation demonstrating the truth vs the
53 libel.

54 15. On August 30, 2023, Tucker Carlson appeared on an online Podcast of Adam
55 Carolla where Carlson discusses media and the press dependence on
56 government and how it affects what and how media reports stories.

57 16. In the appearance on Carolla's podcast Carlson referenced how the media
58 reacted to Plaintiff in 2008 and mentioned specifically how one reporter
59 published material and claims about plaintiff solely to try and discredit plaintiff.
60 Carlson stated he had interviewed the plaintiff.

61 17. As expected by plaintiff Carlson's August 30, 2023 statements in online
62 podcast began to open the damn of republication of libelous claims and
63 statements both by legacy media outlets like the Daily Mail UK as well as by
64 individuals claiming to be Journalists using social media platforms such as X
65 (Formerly known as Twitter), Substack, YouTube et al. where they generate
66 income via subscriptions, advertising revenue sharing and direct
67 tips/donations from followers and subscribers.

68 18. On September 5, 2023, Journalist Tucker Carlson released a one minute four
69 second promotional clip of his interview with plaintiff on X (formerly known as
70 Twitter) which reached more than 76 million viewers. Upon the release of that
71 promo clip defendants Brian Krassenstein and Edward Krassenstein began
72 publishing on X in response to said clip libelous, false claims and statements
73 about plaintiff which they obtained by simply Googling plaintiff's name.

74 19. On September 6, 2023, Tucker Carlson aired the entire video interview with
75 plaintiff on X (formerly known as Twitter) at 6PM Eastern Time.

76 20. Defendants Brian Krassenstein and Edward Krassenstein upon the airing on
77 September 6, 2023, of full interview began publishing more libel false claims
78 and statements about plaintiff.

79 21. Plaintiff immediately responded to both defendants informing them their posts
80 were libelous, false and that their republishing someone else's libel did not
81 make them immune from legal action. Plaintiff specifically requested both
82 plaintiffs retract the published statements, admit they published other people's
83 libel without first verifying its truthfulness and apologize.

84 22. Both defendants Brian and Edward Krassenstein refused and even tried to
85 use their publication of libel to pressure plaintiff into appearing on their online
86 an X platform programs so they could profit from the trending interest in the
87 interview by benefit of the number of listeners they could draw.

88 23. Plaintiff gave defendants multiple opportunities to retract their repeated libel
89 and false claims and apologize and resolve this issue without having to
90 engage in litigation. Defendant Edward Krassenstein chose to simply ignore
91 plaintiffs repeated requests and offers while defendant Brain Krassenstein
92 chose to inform plaintiff on September 18, 2023, via a direct message on X at
93 5:12am:

94 a. ***"Even better come on my show and we can discuss. I posted***
95 ***what was in the public realm for 15 years which you made no***

96 **effort to have removed in the past as far as I'm aware but I'll be**
97 **happy to take a look and remove anything I find to be inaccurate."**

98 24. Despite Defendant Brian Krassenstein message on September 18, 2023,
99 defendant had already been provided documentation his published claims
100 were false and had he bothered to research he would have found they had
101 been proven false for more than 10 years before he published them.

102 25. On September 25, 2023, at 6:29PM Defendant Brian Krassenstein published
103 in a comment to plaintiff on X (formerly known as Twitter) the following
104 statement:

105 **a. You can just fast forward your timer. I'm not giving into you**
106 **attempt to get \$750k from me for posting material that has been**
107 **online about you since 2008. I would love for you to stop**
108 **defaming me though and doxxing my private information. I will**
109 **actually contact a real attorney if it continues, and not just try to**
110 **extort money off of you via email. Nice try though.**

111 26. Defendant Edward Krassenstein has been exposed via and undercover video
112 recording of him admitting that defendant and defendant Brian Krassenstein
113 are paid to "sew division" as part of "the resistance" and use their X (formerly
114 known as Twitter) presence and their businesses which are listed herein as
115 defendants E&B Advertising Inc and Forum Advertising LLC to publish and
116 distribute content based on its clients requests in directing of political or social
117 narratives.

27. Defendants Brian Krassenstein, Edward Krassenstein, E&B Advertising Inc, and Forum Advertising LLC repeatedly published false, knowingly untrue claims and statements represented as "facts" and "Proven facts" alleging plaintiff:

- a. Has a 27-year criminal history
- b. Has a history of convictions for fraud
- c. Failed two polygraph/lie detector tests.
- d. Has a history of making false statements
- e. Has a 27-year proven history of deception.

COUNT I
(Libel/Libel Per Se)

28. The foregoing allegations of the complaint are incorporated herein by reference.

29. In or about September 2023 the defendants published the libelous defamatory statements on X (formerly known as Twitter)

30. The libelous defamatory statements referred to plaintiff by name or were published where they were clearly referring directly to plaintiff, were made of and concerning him, and were so understood by those reading the libelous defamatory statements.

31. The libelous defamatory statements are false and misleading as they refer to Plaintiff Sinclair.

146 32. The libelous defamatory statements were made and published by defendants
147 with knowledge of their falsity and with reckless and total disregard for their
148 truth.

149 33. Given the readily available documented truth the defendants libelous
150 defamatory statements were so excessive, intemperate, unreasonable and
151 abusive as to preclude any conclusion other than the defendants were
152 actuated by actual malice.

153 34. The defamatory statements are libelous on their face, in that they expose
154 Sinclair to hatred, contempt, ridicule and obloquy because they published
155 states that *inter alia* Sinclair has a 27-year criminal history, history of
156 convictions for fraud, 27 year history of deception proven, failed two
157 polygraph tests etc.

158 35. The defamatory libelous statements have been made in a specific forum and
159 are available to be read, seen, shared and redistributed by the public
160 including without limitation citizens of the Southern District of Texas.

161 36. The defamatory libelous statements were not privileged and were published
162 by the defendants with malice, hatred, contempt and ill will toward Sinclair
163 with the desire to cause him economic, emotional, physical, injury including
164 loss of financial support toward needed medical treatment.

165 37. As a direct and proximate result of the foregoing, Sinclair has suffered loss of
166 reputation, extreme emotional duress, shame, interference with obtaining
167 necessary medical treatment, physical injury, obloquy and loss of
168 opportunities in an amount to proven at trial in excess of \$15,000.000.00

169 38. Because of defendants' intentional malice in publishing the defamatory and
170 libelous statements, Sinclair is entitled to an award punitive and exemplary
171 damages.

172 **COUNT II**
173 ***(False Light Invasion/Misappropriation of Privacy)***
174
175

176 39. The foregoing allegations of the complaint are incorporated herein by
177 reference.

178 40. The published defamatory libelous statements concerning Sinclair place him
179 in a false light which would be highly offensive to a reasonable person.

180 41. Defendants had knowledge of and acted in total reckless disregard for the
181 falsity of their defamatory libelous statements and the false light in which
182 Sinclair would be placed in.

183 42. Defendants have misappropriated Sinclair's' right to privacy.

184 43. As a direct and proximate result of the foregoing, Sinclair has suffered
185 damages in an amount to be proven at trial in excess of \$15,000.000.00.

186 44. Because of defendants' intentional malice in publishing the defamatory and
187 libelous statements, Sinclair is entitled to an award punitive and exemplary
188 damages.
189

190 **COUNT III**
191 ***(Tortious Interference)***
192

193 45. The foregoing allegations of the complaint are incorporated herein by
194 reference.
195

196 46. At all relevant time Sinclair had an active Go Fund Me fundraising campaign
197 in effect which was established in July 2023 for the purpose of raising funds
198 to pay for needed medical treatment (specifically) surgery on his hands and
199 arms due to years of nerve and disc damage, to prevent Sinclair total loss of
200 use of both hands and arms.

201 47. Defendants had knowledge of such relationship, campaign or expectancy.
202

203 48. Defendants intentionally interfered with said relationship by publishing of their
204 defamatory and libelous statements.

205 49. As a direct and proximate result of the foregoing, Sinclair has suffered
206 damages in an amount to be proven at trial in excess of \$15,000,000.00.

207 50. Further, Defendants' tortious interference was with intent to injure and harm
208 Sinclair so as to constitute oppression, fraud and malice justifying an award of
209 exemplary and punitive damages in an amount to be determined at trial.

210 **COUNT IV**
211 ***(Civil Conspiracy)***

212
213 51. The foregoing allegations of the complaint are incorporated herein by
214 reference.

215 52. Defendants have combined and conspired for an unlawful purpose, i.e.,
216 defamation, libel and tortious interference with intent to injure plaintiff.

217 53. Defendants have done one or more overt acts in furtherance of their
218 conspiracy.

DIVISION OF CORPORATIONS

EXHIBIT A



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search by Entity Name](#) /

Detail by Entity Name

Florida Limited Liability Company
FORUM ADVERTISING LLC

Filing Information

Document Number L14000003100
FEI/EIN Number 46-4513869
Date Filed 01/07/2014
State FL
Status ACTIVE

Principal Address

15128 Anchorage Way
Fort Myers, FL 33908

Changed: 03/02/2016

Mailing Address

15128 Anchorage Way
Fort Myers, FL 33908

Changed: 03/02/2016

Registered Agent Name & Address

KRASSENSTEIN, BRIAN
15128 Anchorage Way
Fort Myers, FL 33908

Address Changed: 03/02/2016

Authorized Person(s) Detail

Name & Address

Title MGR

KRASSENSTEIN, BRIAN
15128 Anchorage Way
Fort Myers, FL 33908

Title MGR

KRASSENSTEIN, EDWARD
 15231 INTRACOASTAL CT
 FORT MYERS, FL 33908

Annual Reports

Report Year	Filed Date
2021	04/05/2021
2022	04/12/2022
2023	04/08/2023

Document Images

<u>04/08/2023 -- ANNUAL REPORT</u>	View image in PDF format
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<u>01/07/2014 -- Florida Limited Liability</u>	View image in PDF format

2023 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L14000003100

Entity Name: FORUM ADVERTISING LLC

Current Principal Place of Business:

15128 ANCHORAGE WAY
FORT MYERS, FL 33908

Current Mailing Address:

15128 ANCHORAGE WAY
FORT MYERS, FL 33908 US

FEI Number: 46-4513869

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

KRASSENSTEIN, BRIAN
15128 ANCHORAGE WAY
FORT MYERS, FL 33908 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title	MGR	Title	MGR
Name	KRASSENSTEIN, BRIAN	Name	KRASSENSTEIN, EDWARD
Address	15128 ANCHORAGE WAY	Address	4921 SW 25TH PLACE
City-State-Zip:	FORT MYERS FL 33908	City-State-Zip:	CAPE CORAL FL 33914

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: EDWARD KRASSENSTEIN

MGR

04/08/2023

Electronic Signature of Signing Authorized Person(s) Detail

Date